

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA**

**v.**

**RYAN FARACE and  
JOSEPH FARACE**

**Defendants.**

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**CRIMINAL NO. CCB-21-294**

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**CONSENT MOTION TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

Comes now the United States of America, by and through its counsel, Erek L. Barron, the United States Attorney for the District of Maryland, and Dana J. Brusca, Assistant United States Attorney for said district, and with the consent of counsel for the Defendant, respectfully submits this Consent Motion to Exclude Time Under the Speedy Trial Act.

1. On August 3, 2021, a one-count indictment was returned against the Defendants, Ryan and Joseph Farace, for Conspiracy to Commit Money Laundering, in violation of 18 U.S.C. § 1956(h). ECF No. 1.

2. On October 8 (Ryan) and October 6 (Joseph), 2021, the Defendants had their initial appearances and Ryan Farace further entered a plea of not guilty. ECF Nos. 11, 17, 18.

3. The most recent status report filed with the Court on May 24, 2022, confirmed that voluminous discovery had been provided and requested 60 additional for the parties to determine if the case could be resolved short of a trial. ECF No. 38. The Court approved the request for additional time and ordered the parties to file the next status report on July 25, 2022. ECF Nos. 39, 40.

4. The Speedy Trial Act provides that the trial of the defendant shall commence within seventy days “from the filing date (and making public) of the information or indictment.” 18 U.S.C. § 3161(c)(1). However, pursuant to 18 U.S.C. § 3161(h)(7)(A), any delay resulting from a continuance is excluded for speedy trial purposes if based on a finding that the ends of justice served by taking such action outweigh the interest of the public and defendant in a speedy trial.

5. The circumstances of this case require a continuance under the Speedy Trial Act. Here, discovery was voluminous. Further, as a result of the COVID-19 pandemic, it has been especially difficult for defense counsel to review discovery with their clients—particularly defendants who are incarcerated pending trial. Finally, the schedules of counsel in this and other matters has necessitated additional time for defendants and counsel to review discovery, and in which the parties can determine if resolution of this matter can be reached short of a trial.

6. Defendants' counsel, David Walsh Little and Gerald Ruter, consent to the Speedy Trial Act exclusion requested by this motion.

WHEREFORE, with the consent of counsel for the Defendants, counsel for the Government requests that the Court exclude all time, pursuant to 18 U.S.C. § 3161(h)(7)(A), from May 19, 2022 through July 25, 2022 under the Speedy Trial Act.

Respectfully submitted,

Erek L. Barron  
United States Attorney  
District of Maryland

By:       /s/        
 Dana J. Brusca  
 Assistant United States Attorney  
 United States Attorney's Office  
 District of Maryland